

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRINITY BUI and TRINITY FINANCING
INVESTMENTS CORPORATION,

Case No.: 08 CV 0583(VM)

Plaintiff,

**AMENDED NOTICE OF
MOTION**

-against-

INDUSTRIAL ENTERPRISES OF AMERICA INC.,
BECKSTEAD AND WATTS, LLP,
JOHN MAZZUTO, JAMES MARGULIES,
DENNIS O'NEILL, and JORGE YEPES,

Defendants.

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PLEASE TAKE NOTICE, that upon the annexed affirmation of Michael C. Barrows,
Esq, affirmed in March 19, 2008, and upon all the exhibits attached thereto, and the pleadings
herein, plaintiffs will move this Court at the United States Courthouse located at 500 Pearl
Street, New York, New York 10007, before Judge Victor Marrero, United States District Judge,
on April 7, 2008 at 9:30 a.m. or as soon thereafter as counsel may be heard, for an order
pursuant to Rule 55 of the Federal Rules of Civil Procedure granting a default judgment as to
liability against defendants, INDUSTRIAL ENTERPRISES OF AMERICA INC. and
BECKSTEAD AND WATTS, LLP, awarding \$1,991,329.19 on plaintiffs' first cause of action
plus New York statutory interest in an amount of 9 percent per annum from November 6, 2007,
awarding damages on the remaining causes of action as determined at Inquest, granting plaintiffs
the costs and disbursements of this action, and such other and further relief as this Court deems
just and proper.

Dated: New York, New York
March 19, 2008

BARROWS & ASSOCIATE, PLLC.

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